



GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES

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DEPARTMENT OF PLANNING AND NATURAL RESOURCES

45 MARS HILL FREDERIKSTED, ST. CROIX, VI 00840

PHONE: (340) 773-1082, FAX: (340) 692-9794

June 24, 2020

Brian K. Lever President and CEO
Limetree Bay Refining, LLC
Limetree Bay Terminals, LLC
1 Estate Hope
Christiansted, VI 00820-5652

Re: Refinery Sector Rule for Compliance Extension

Dear Mr. Lever:

The Department of Planning and Natural Resources (DPNR) has completed its review of your Refinery Sector Rule (RSR) Request for Compliance Extension submitted under the Clean Air Act 112 (i)(3) and your March 9, 2020 requests for compliance extensions to:

- Complete installation of flare monitoring devices in accordance with 40 C.F.R. §63.670;
- Operate CPMS as required by 40 C.F.R. §63.671;
- Comply with pressure release device (PRD) management requirements under 40 C.F.R. §63.648(j)(3)-(7);
- Implement the maintenance vent control measures in accordance with 40 C.F.R. § 63.643(c);
- Complete energy assessment in accordance with 40 C.F.R. § 63.7510(e) and Table 3;
- Complete initial tune-ups in accordance with 40 C.F.R. § 63.7510(e) and §63.7540(a)(10)(i) through (vi), and;
- Conduct sampling and analysis in accordance with 40 C.F.R. § 63.658.

DPNR concurs with each of your requests for extension for the time periods provided in your RSR and March 9, 2020 requests on all matters, except for your request to extend the fence line monitoring under 40 C.F.R. § 63.658. It is our position that this minimally invasive requirement is both an effective and internal means of ensuring Limetree Bay Refining and Terminals operations are conducted within the parameters established for the facility, but that it also safeguards the community it operates in.

If you have any further questions or concerns, please feel free to contact Verline Marcellin, Air Pollution Control, Environmental Program Manager, Division of Environmental Protection at 340- 774-3320 or via email at verlin.marcellin@dpnr.vi.gov.

Sincerely,

A blue ink signature of Jean-Pierre L. Oriol, written in a cursive style.

Jean-Pierre L. Oriol
Commissioner

cc: Austin Callwood, Director, DEP
Verline Marcellin, APC Program